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November 4, 2015

BY ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Jason Galanis, et al.
USDC, Southern District of New York Case No. 15 CR 643 (PKC)

Dear Judge Castel:

The undersigned represents defendant Jason Galanis in connection with the above-referenced action. We write, with the Government's consent, to respectfully request a two week extension from November 9, 2015 to November 23, 2015 for Jason Galanis to meet his bail conditions.

Defendant's previous request sought an extension until November 9, 2015 and was granted on October 30, 2015 [Dkt. No. 59]. Since that time (as well as beforehand), Jason Galanis and his counsel have continued to make substantial good faith efforts to identify four financially responsible bail signatories and property with which to secure Jason Galanis' bond. Three of the four signatories have been identified and interviewed. We are working diligently to identify the final signatory. The property has also been identified, but it has taken longer than expected to execute the necessary documents to pledge as security, and we anticipate needing the additional two weeks here requested to do so.

Thus, with the consent of the Government, we respectfully request that Your Honor extend the deadline for Jason Galanis to meet his bail conditions until November 23, 2015. Should Your Honor have any questions with respect to this application, please do not hesitate to contact me.

Respectfully submitted,

Thomas P. Mazzucco

cc: Assistant United States Attorney Brian Blais (*via email*)